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Attorneys for Debtor
SOUTHERN INYO HEALTHCARE DISTRICT

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re
SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor.

Case No. 1:16-10015-FEC

Chapter 9

WGG-7

**MOTION TO CONFIRM SEVENTH
AMENDED PLAN FOR ADJUSTMENT OF
DEBTS OF SOUTHERN INYO
HEALTHCARE DISTRICT**

**[Memorandum of Law and Declarations
in Support Filed Concurrently]**

Hearing Date:

Date: May 19, 2020

Time: 1:30 p.m.

Place: 501 I. Street
Sacramento, CA 95814
Courtroom 28

Southern Inyo Healthcare District (“Debtor” or “District”) moves (“Motion”) for an order confirming its Seventh Amended Plan for Adjustment of Debts of Southern Inyo Healthcare District (the “Plan”) as the Plan satisfies all of the requirements of the Bankruptcy Code for confirmation and has been accepted by all creditors who timely voted. In support of the Motion, the District relies upon the following being filed concurrently with this Motion:

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- 1 (i) Memorandum Law in Support of Confirmation of Seventh Amended Plan for
- 2 Adjustment of Debts of Southern Inyo Healthcare District;
- 3 (ii) Declaration of Jeffrey I. Golden in Support of Confirmation of Seventh
- 4 Amended Plan for Adjustment of Debts of Southern Inyo Healthcare District;
- 5 (iii) Declaration of Jaque Hickman in Support of Confirmation of Seventh
- 6 Amended Plan for Adjustment of Debts of Southern Inyo Healthcare District;
- 7 (iv) Declaration of Peter Spiers in Support of Confirmation of Seventh Amended
- 8 Plan for Adjustment of Debts of Southern Inyo Healthcare District;
- 9 (v) Declaration of Don Fife in Support of Confirmation of Seventh Amended
- 10 Plan for Adjustment of Debts of Southern Inyo Healthcare District; and
- 11 (vi) Declaration of Kelly Adele Regarding the Tabulation and Analysis of Ballots
- 12 Cast in Acceptance or Rejection of the Seventh Amended Plan for
- 13 Adjustment of Debts of Southern Inyo Healthcare District;
- 14 The District also relies upon the following previously filed pleadings:
- 15 (vii) The Plan;
- 16 (viii) Seventh Amended Disclosure Statement with Respect to the Seventh
- 17 Amended Plan for Adjustment of Debts of Southern Inyo Healthcare District;
- 18 (ix) Exhibits to Seventh Amended Plan for Adjustment of Debts of Southern Inyo
- 19 Healthcare District;
- 20 (x) Declaration of Ed Rodieck re Service of (1) Seventh Amended Plan for
- 21 Adjustment of Debts of Southern Inyo Healthcare District; (2) Seventh
- 22 Amended Disclosure Statement with Respect to the Seventh Amended Plan
- 23 for Adjustment of Debts of Southern Inyo Healthcare District; (3) Exhibits to
- 24 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
- 25 Healthcare District; (4) Order Approving Seventh Amended Plan for
- 26 Adjustment of Debts of Southern Inyo Healthcare District and Plan
- 27 Confirmation Scheduling Order; and (5) Ballot for Accepting or Rejecting
- 28

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1 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
 2 Healthcare District; and
 3 (xi) Supplemental Proof of Service for (1) Seventh Amended Plan for
 4 Adjustment of Debts of Southern Inyo Healthcare District; (2) Seventh
 5 Amended Disclosure Statement with Respect to the Seventh Amended Plan
 6 for Adjustment of Debts of Southern Inyo Healthcare District; (3) Exhibits to
 7 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
 8 Healthcare District; (4) Order Approving Seventh Amended Plan for
 9 Adjustment of Debts of Southern Inyo Healthcare District and Plan
 10 Confirmation Scheduling Order; and (5) Ballot for Accepting or Rejecting
 11 Seventh Amended Plan for Adjustment of Debts of Southern Inyo
 12 Healthcare District.

13 Dated: April 21, 2020

WEILAND GOLDEN GOODRICH LLP

15 By: /s/ Jeffrey I. Golden
 16 JEFFREY I. GOLDEN
 17 Attorneys for Debtor
 SOUTHERN INYO HEALTHCARE
 DISTRICT